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12 Special Counsel to Richard A. Marshack,  
13 Chapter 11 Trustee

14  
15 **UNITED STATES BANKRUPTCY COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **SANTA ANA DIVISION**

18 In re:

19 THE LITIGATION PRACTICE GROUP P.C.,  
20 Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

**DECLARATION OF CHAPTER 11  
TRUSTEE'S COUNSEL REGARDING  
PROOF OF NOTICE OF HEARING AND  
SERVICE FOR MOTION (I) FOR ENTRY  
OF A SECOND INTERIM ORDER:  
(A) AUTHORIZING THE TRUSTEE TO  
OBTAIN ADDITIONAL POST-PETITION  
FINANCING AND SUPERPRIORITY  
ADMINISTRATIVE EXPENSE CLAIM  
PURSUANT TO 11 U.S.C. § 364; AND  
(B) SETTING FINAL HEARING; AND  
PURSUANT TO FINAL HEARING,  
(II) FOR ENTRY OF FINAL ORDER  
APPROVING POST-PETITION  
FINANCING ON A FINAL BASIS**

Date: July 19, 2023

Time: 1:30 p.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C

411 W. Fourth Street  
Santa Ana, CA 92701

1 I, JONATHAN SERRANO, declare:

2 1. I am an associate attorney in the law firm of Dinsmore & Shohl LLP, special counsel  
3 to Richard A. Marshack, the Chapter 11 Trustee for the bankruptcy estate of The Litigation Practice  
4 Group, P.C. in the above-captioned bankruptcy case. As such, except as expressly stated otherwise,  
5 I have personal knowledge of the facts set forth below and could and would competently testify  
6 under oath thereto if requested to do so.

7 1. At approximately 1:44 p.m. on Monday, July 17, 2023, I became aware that the  
8 Court scheduled a hearing on the *Motion (I) for Entry of a Second Interim Order: (A) Authorizing*  
9 *the Trustee to Obtain Additional Post-Petition Financing and Superpriority Administrative Expense*  
10 *Claim Pursuant to 11 U.S.C. § 364; and (B) Setting Final Hearing; and Pursuant to Final Hearing,*  
11 *(II) for Entry of Final Order Approving Post-Petition Financing on a Final Basis* (the “Motion”)  
12 for Wednesday, July 19, 2023 at 1:30 p.m. and that notice must be given to interested parties by  
13 5:00 p.m. on July 17, 2023.

14 2. Immediately thereafter, I emailed Kenneth Miskin and Queenie Ng from the Office  
15 of the United States Trustee to notify them of the hearing.

16 3. At approximately 2:24 p.m. on July 17, 2023, I emailed all creditors who had filed a  
17 proof of claim, providing them with notice of the hearing and a copy of the Motion and supporting  
18 declaration and exhibits.

19 4. In addition, I reviewed the ECF list. The Court set the hearing on the Motion,  
20 thereby notifying those parties on the ECF list.

21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct.

23

24 DATED: July 18, 2023

/s/ Jonathan Serrano

Jonathan Serrano

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Dinsmore & Shohl LLP  
550 S. Hope Street, Suite 1765  
Los Angeles, California 90071

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF CHAPTER 11 TRUSTEE'S COUNSEL REGARDING PROOF OF NOTICE OF HEARING AND SERVICE FOR MOTION (I) FOR ENTRY OF A SECOND INTERIM ORDER: (A) AUTHORIZING THE TRUSTEE TO OBTAIN ADDITIONAL POST-PETITION FINANCING AND SUPERPRIORITY ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 364; AND (B) SETTING FINAL HEARING; AND PURSUANT TO FINAL HEARING, (II) FOR ENTRY OF FINAL ORDER APPROVING POST-PETITION FINANCING ON A FINAL BASIS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 18, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) July 18, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 18, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 18, 2023

Katrice Ortiz

/s/ Katrice Ortiz

Date

Printed Name

Signature

**In re The Litigation Practice Group, P.C.**  
**U.S.B.C., Central District of California, Santa Ana**  
**Case No. 8:23-bk-10571-SC**

**I. SERVED ELECTRONICALLY VIA NEF:**

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- **United States Trustee (SA):** ustpregion16.sa.ecf@usdoj.gov
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- **Johnny White:** JWhite@wrslawyers.com, jlee@wrslawyers.com

**II. SERVED VIA REGULAR U.S. MAIL:**

N/A

**III. SERVED VIA OVERNIGHT MAIL (FED EX):**

**United States Bankruptcy Court**

Honorable Scott Clarkson  
United States Bankruptcy Court  
Central District of California  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, California 92701